



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

*February 12, 1997*

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Marion Edwyn Harrison, Esquire  
107 Park Washington Court  
Falls Church, VA 22046

RE: MUR 3774  
Coalitions for America, Inc.

Dear Mr. Harrison:

On August 8, 1995, you were notified that the Federal Election Commission had found reason to believe your client, Coalitions for America, Inc., violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended (the "Act").

Pursuant to its investigation of this matter, the Commission has issued the attached Subpoena to Produce Documents and Order to Submit Written Answers requiring your client to provide information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Act.

It is required that your client submit all answers to questions under oath within 30 days of your receipt of this Subpoena and Order. If you have any questions, please contact me at (202) 219-3400.

Sincerely,

*Dawn M. Odrowski by*  
*mao*

Dawn M. Odrowski  
Attorney

Enclosure  
Subpoena and Order

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)  
) MUR 3774  
)

**SUBPOENA TO PRODUCE DOCUMENTS**  
**ORDER TO SUBMIT WRITTEN ANSWERS**

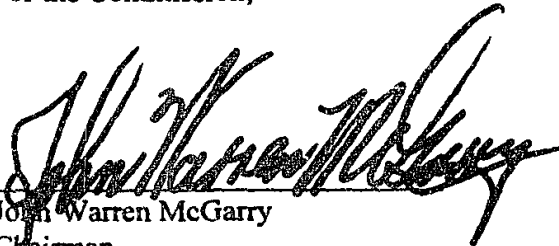
TO: Coalitions for America, Inc.  
c/o Marion Edwyn Harrison, Esq.  
107 Park Washington Court  
Falls Church, VA 22046

Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

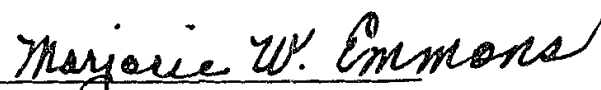
Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 30 days of receipt of this Order and Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his  
hand in Washington, D.C. on this *11th* day of *February* 1997.

For the Commission,

  
John Warren McGarry  
Chairman

ATTEST:

  
Marjorie W. Emmons  
Secretary to the Commission

Attachments  
Interrogatories and Request for Documents

## **INSTRUCTIONS**

In answering the enclosed interrogatories and the request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1992 through the pendency of this matter.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

## **DEFINITIONS**

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained. For all types of documentary records requested, if any of these records are maintained on any storage format for computerized information (e.g., hard drive, floppy disk, CD-ROM), provide copies of the records as maintained on that storage format in addition to hard (i.e., paper) copies.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses, the telephone numbers, the present occupation or position of such person, and the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and request for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

"Communication(s)," or "communicated" encompasses both oral and written communications, including phone calls, meetings, correspondence, notes or memos, and electronic mail messages,

### INTERROGATORIES

1. With respect to the three attached Coalitions for America grant checks payable to the National Right to Work Committee and the League of Catholic Voters (Attachment 1):
  - a. For each check, identify all persons at the League of Catholic Voters and the National Right to Work Committee with whom Eric Licht or others at Coalitions for America discussed the check.
  - b. Describe the specific purpose of each grant check.
  - c. Identify the person(s) who decided to make each grant and state the basis upon which each grant was made.
2. State whether Coalitions for America made grants to any organizations other than the League of Catholic Voters and the National Right to Work Committee in 1992. If so, for each grant, identify the date and amount of the grant check, the recipient of the grant, and describe the purpose of the grant.
3. State the total costs paid by Coalitions for America for sponsoring, producing and/or airing each of the following National Empowerment Television segments.
  - a. October 13, 1992 segment of *Empowerment Outreach*
  - b. October 20, 1992 segment of *Family Forum*.
  - c. November 10, 1992 segment of *Empowerment Outreach*
  - d. November 12, 1992 segment of *Family Forum*

### PRODUCTION OF DOCUMENTS

1. Produce all documents in any way relating to or referencing the grant checks attached as Attachments 1. The documents produced should include, but not be limited to, any transmittal letters or other correspondence, notes, memoranda, electronic mail messages, phone messages or fax and phone logs.
2. Produce complete copies of all Form 990 or Form 990 EZ tax returns filed by Coalitions for America covering the year 1992.